REMARKS/ARGUMENTS

1.) Claim Amendments

Claims 1-24 are pending in the application. The Applicants have amended claims 1, 9, 16, 23, and 24. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Claim Rejections – 35 U.S.C. § 102(b)

On Page 3 of the Final Office Action, the Examiner repeated his rejection of claims 1-3, 7-11, 15, 16-17, 19-20, and 23 under 35 U.S.C. § 102(b) as being anticipated by Johnson et al. (US Pub. No. 2003/0084162 A1). The Applicants have amended the claims to better distinguish the claimed invention from Johnson. The Examiner's consideration of the amended claims is respectfully requested.

The Applicants respectfully submit that the Applicants' claimed invention and Johnson are quite different -- solving different problems with different solutions. Although both describe a configuration request originating from an inside realm node, in the claimed invention a session is initiated by the inside realm node and the process concludes with a session being established with another (outside realm) party. In Johnson, on the other hand, the process establishes a pre-session state in which an outside realm node at a later time can establish a session.

Regarding claim 1, it is noted that a node of the inside realm sends a request to a communication gateway coupled to the inside realm network. Here, the inside realm node has taken the initiative for creation of a connection between a node of an inside address realm and a node of an outside address realm. The communication gateway allocates an inside node port number and an outside realm gateway address from a pool of gateway addresses. Novelty lies here in the central allocation of the port number by the gateway. By centrally allocating the port number, the Applicants' claimed invention avoids collisions in the use of port numbers since the gateway is able to select a port number that is not in use by any other node. Therefore, blocking due to collisions in the use of port numbers is avoided. The outside realm gateway address

and the inside of port number (which is selected by the gateway) are then transmitted to the inside realm node.

The disclosure of Johnson is quite different. According to Johnson and other prior art, an application in the inside realm node selects the port number, not another entity. Prior to establishing a connection, the inside realm node provides a name/address server with relevant address information comprising private and public addresses and port numbers. The name/address server makes this address information available to outside realm nodes for a limited time period, which can be extended when the name/address server receives keep-alive indications. Thus, according to Johnson, the port numbers are selected by the inside realm node an thus the risk of collisions is still present. Upon receiving a request for address information from an outside realm node, the name/address server provides the outside realm node with the address stored by the name/address server. Thus, the process enables an outside realm node to initiate a connection to the inside realm node -- the opposite of the claimed invention.

Thus, while the Applicants' claimed invention solves the problem of blocking due to collisions in the use of the same port number in different sessions, Johnson solves the problem that an outside realm node cannot initiate a communication session with a node behind a firewall (an inside realm node). The Applicants' claimed invention solves its problem by using a communication gateway which centrally allocates port numbers for use in different sessions. Johnson, on the other hand, solves its problem by having an inside realm node provide its address and port number to a name/address server which is accessible by outside realm nodes. Finally, while the Applicants' claimed invention enables an inside realm node to initiate a session with an outside realm node, Johnson does the opposite and establishes a pre-session state in which an outside realm node at a later time can establish a session with an inside realm node.

Claim 1 has been amended to clarify that the outside-realm gateway address and the inside node port number are centrally allocated by the intermediate communication gateway. This is done in response to a configuration request initiated from the inside-realm node. These limitations are not taught or suggested by Johnson. Therefore, the allowance of amended claim 1 is respectfully requested.

Claims 2, 3, 7, and 8 depend from amended claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claims 2, 3, 7, and 8 is respectfully requested.

Independent claim 9 has been amended in a manner similar to claim 1, to recite means within the intermediate communication gateway for centrally allocating, in response to a configuration request initiated from the inside-realm node, an outside-realm gateway address from the pool of gateway addresses and an inside node port number for the inside-realm node. As noted, these limitations are not taught or suggested by Johnson. Therefore, the allowance of amended claim 9 is respectfully requested.

Claims 10, 11, and 15 depend from amended claim 9 and recite further limitations in combination with the novel elements of claim 9. Therefore, the allowance of claims 10, 11, and 15 is respectfully requested.

Independent claim 16, which recites a gateway resource manager for a communication gateway, has also been amended in a manner similar to claim 1. Amended claim 16 recites means for centrally allocating, in response to a configuration request initiated from one of the inside-realm nodes, an outside-realm gateway address from the pool of gateway addresses and an inside node port number to be used in establishing a gateway connection state for a flow between the inside-realm node and an outside-realm node. As noted, these limitations are not taught or suggested by Johnson. Therefore, the allowance of amended claim 16 is respectfully requested.

Claims 17, 19, and 20 depend from amended claim 16 and recite further limitations in combination with the novel elements of claim 16. Therefore, the allowance of claims 17, 19, and 20 is respectfully requested.

Independent claim 23 has been amended to recite the step of centrally allocating by the intermediate communication gateway, an outside-realm gateway address from the pool of gateway addresses and an inside node port number in response to a configuration request initiated from the inside-realm node. As noted, these limitations are not taught or suggested by Johnson. Therefore, the allowance of amended claim 23 is respectfully requested.

3.) Claim Rejections – 35 U.S.C. § 103(a)

On Page 9 of the Office Action, the Examiner rejected claims 4-6, 12, 13, 14, and 24 under 35 U.S.C. § 103(a) as being unpatentable over Johnson et al. (US Pub. No. US2003/0084162 A1) in view of Alkhatib (Pub. No. 2002/0184390 A1). The Applicants respectfully submit that the amendments to independent claims 1, 9, 16, and 23 also distinguish the claimed invention from the combination of Johnson and Alkhatib.

Alkhatib seems to be cited only because it mentions sockets, and the rejected dependent claims recite that the allocated outside realm gateway address and inside port number are represented by an allocated socket network address and a source port number. Alkhatib relates to domain name routing, and like Johnson, does not teach or suggest that the outside-realm gateway address and the inside node port number are centrally allocated by the intermediate communication gateway in response to a configuration request initiated from the inside-realm node. Each of the amended independent claims recites these limitations. Therefore, the allowance of dependent claims 4-6, 12, 13, and 14 is respectfully requested.

Independent claim 24 recites an inside-realm communication terminal that communicates with any of a number of outside-realm hosts via a communication gateway. Claim 24 has been amended to recite means for requesting from the communication gateway, in a modified DNS (Domain Name Server) query, central configuration information for communication with a selected one of the outside-realm hosts, wherein the central configuration information is centrally allocated by the communication gateway. The combination of Johnson and Alkhatib does not teach or suggest an inside-realm communication terminal configured to communicate with a communication gateway in this manner. In Johnson, for example, the inside realm node selects a port number itself and sends it to the name/address server. Alkhatib relates to domain name routing, and does not address this issue. Therefore, the allowance of amended claim 24 is respectfully requested.

4.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore,

respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-24.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,

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